

Michael Kind, Esq.
Nevada Bar No.: 13903
KIND LAW
8860 South Maryland Parkway, Suite 106
Las Vegas, Nevada 89123
(702) 337-2322
(702) 329-5881 (fax)
mk@kindlaw.com
Attorney for Plaintiff Francis Wooters

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Francis Wooters,
v.
Experian Information Solutions, Inc. et al,
Defendants.

Plaintiff,

Case No.: 2:22-cv-01691-CDS-BNW

STIPULATION TO EXTEND DEADLINE TO FILE THE PROPOSED DISCOVERY PLAN AND SCHEDULING ORDER (FIRST REQUEST)

Francis Wooters (“Plaintiff”) and Defendants First National Bank of Omaha, Capital One, N.A., successor-by-merger to Capital One Bank (USA) N.A., and Trans Union, LLC (“Defendants”) (jointly as the “Parties”), by and through their respective counsel, hereby stipulate to extend Local Rule 26-1’s deadline for the parties to hold their initial FED. R. CIV. P. 26(f) conference and to file their proposed discovery plan and scheduling order (the “Deadline”).

Good cause exists to extend the Deadline. The Parties need additional time for counsel to coordinate to set the discovery conference. Additionally, Trans Union's MLD Motion to Transfer Actions is still pending, and the remaining Parties are engaged in active settlement discussions that may alleviate the need to submit a

proposed discovery plan. Therefore, it is appropriate to extend the Deadline for the Parties to file their proposed discovery plan and scheduling order to allow time for the Parties to meet and confer in compliance with Local Rule 26-1(b).

Parties therefore request to extend the Deadline by 30 days, making the new deadline for the submission of a stipulated discovery plan and scheduling order on January 16, 2023. This is the first request for an extension of this deadline.

Dated: December 16, 2022.

KIND LAW

/s/ Michael Kind

Michael Kind, Esq.
8860 South Maryland Parkway, Suite 106
Las Vegas, Nevada 89123
Counsel for Plaintiff

JONES LOVELOCK

/s/ Sue Trazig Cavaco

Sue Trazig Cavaco, Esq.
Nicole E. Lovelock, Esq.
Marta Kurshumova, Esq.
6600 Amelia Earhart Ct., Ste. C
Las Vegas, Nevada 89119
Counsel for First National Bank of Omaha

MCDONALD CARANO LLP

/s/ Karyna M. Armstrong

Karyna M. Armstrong, Esq.
Jeff Silvestri, Esq.
2300 West Sahara Avenue, Suite 1200
Las Vegas, Nevada 89102
Counsel for Capital One, N.A. (successor-by-merger to Capital One Bank (USA), N.A.)

ORDER

IT IS SO ORDERED

DATED: 4:26 pm, December 19, 2022


BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

1 **QUILLING, SELANDER, LOWNDS, WINSLETT & MOSER, P.C.**
2

3 /s/ Rachael Swernofsky
4

Rachael Swernofsky, Esq.
6900 N. Dallas Parkway, Suite 800
Plano, Texas 75024
Counsel for Trans Union LLC